

EXHIBIT A

DECLARATION OF JOHN W. VEENSTRA

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

GEOTAG INC.,

Plaintiff,

v.

**FRONTIER COMMUNICATIONS
CORPORATION, *et al.*,**

Defendant,

2:10-cv-00265

GEOTAG INC.,

Plaintiff,

v.

YELLOWPAGES.COM, LLC, *et al.*,

Defendants,

2:10-cv-00272

GEOTAG INC.,

Plaintiff,

v.

GEORGIO ARMANI S.P.A.; *et al.*,

Defendants,

2:10-cv-00569

GEOTAG INC.,

Plaintiff,

v.

AROMATIQUE, INC.; *et al.*,

Defendants

2:10-cv-00570

GEOTAG INC., Plaintiff, v. GUCCI AMERICA, INC.; <i>et al.</i>, Defendants,	2:10-cv-00571
GEOTAG INC., Plaintiff, v. STARBUCKS CORP.; <i>et al.</i>, Defendants	2:10-cv-00572
GEOTAG INC., Plaintiff, v. RENT-A-CENTER, INC.; <i>et al.</i>, Defendants	2:10-cv-00573
GEOTAG INC., Plaintiff, v. THE WESTERN UNION COMPANY; <i>et al.</i>, Defendants	2:10-cv-00574

GEOTAG INC.,

Plaintiff.

v.

ROYAL PURPLE, INC.; *et al.*,

Defendants

2:10-cv-00575

GEOTAG, INC.,

Plaintiff,

v.

YAKIRA, L.L.C.; *et al.*,

Defendants

2:10-cv-00587

GEOTAG INC.,

Plaintiff,

v.

WHERE 2 GET IT, INC.; *et al.*,

Defendants

2:11-cv-00175

GEOTAG INC.,

Plaintiff,

v.

ZOOSK, INC.

Defendant.

2:11-cv-00403

GEOTAG INC., Plaintiff, v. EYE CARE CENTERS OF AMERICA, INC. Defendant.	2:11-cv-00404
GEOTAG INC., Plaintiff, v. AMERCO, <i>et al.</i> Defendants	2:11-cv-00421
GEOTAG INC., Plaintiff, v. 7-ELEVEN, INC., <i>et al.</i>, Defendants	2:11-cv-00424
GEOTAG INC., Plaintiff, v. SUNBELT RENTALS, INC. Defendant.	2:11-cv-00425

GEOTAG INC.,

Plaintiff,

v.

CLASSIFIED VENTURES, LLC.

Defendant.

2:11-cv-00426

GEOTAG INC.,

Plaintiff,

v.

**CANON INC. and,
CANON U.S.A., INC.,**

Defendants,

2:12-cv-00043

GEOTAG INC.,

Plaintiff,

v.

AMERICAN APPAREL INC.,

Defendant,

2:12-cv-00436

GEOTAG INC.,

Plaintiff,

v.

ABERCROMBIE & FITCH CO.,

Defendant,

2:12-cv-00437

GEOTAG INC.,

Plaintiff,

v.

AMERICAN EAGLE OUTFITTERS INC.,

Defendant,

2:12-cv-00438

GEOTAG INC.,

Plaintiff,

v.

ANN INC.,

Defendant,

2:12-cv-00439

GEOTAG INC.,

Plaintiff,

v.

BURLEIGH POINT LTD.,

Defendant,

2:12-cv-00441

GEOTAG INC.,

Plaintiff,

v.

CATALOGUE VENTURES, INC.,

Defendant,

2:12-cv-00442

GEOTAG INC., Plaintiff, v. BURBERRY LIMITED, Defendant,	2:12-cv-00443
GEOTAG INC., Plaintiff, v. BURLINGTON FACTORY WAREHOUSE CORPORATION, Defendant,	2:12-cv-00444
GEOTAG INC., Plaintiff, v. CACHE INC., Defendant,	2:12-cv-00445
GEOTAG INC., Plaintiff, v. THE WILLIAM CARTER COMPANY, Defendant,	2:12-cv-00446

GEOTAG INC.,

Plaintiff,

v.

CHARMING SHOPPES INC.,

Defendant,

2:12-cv-00447

GEOTAG INC.,

Plaintiff,

v.

CHICO'S FAS INC.,

Defendant,

2:12-cv-00448

GEOTAG INC.,

Plaintiff,

v.

CITI TRENDS INC.,

Defendant,

2:12-cv-00449

GEOTAG INC.,

Plaintiff,

v.

CLAIRE'S BOUTIQUES, INC.,

Defendant,

2:12-cv-00450

GEOTAG INC.,

Plaintiff,

v.

COLDWATER CREEK INC.,

Defendant,

2:12-cv-00451

GEOTAG INC.,

Plaintiff,

v.

DAVID'S BRIDAL INC.,

Defendant,

2:12-cv-00452

GEOTAG INC.,

Plaintiff,

v.

DEB SHOPS INC.,

Defendant,

2:12-cv-00453

GEOTAG INC.,

Plaintiff,

v.

DELIAS INC.,

Defendant,

2:12-cv-00454

GEOTAG INC.,

Plaintiff,

v.

**DESTINATION MATERNITY
CORPORATION,**

Defendant,

2:12-cv-00455

GEOTAG INC.,

Plaintiff,

v.

DIESEL U.S.A. INC.,

Defendant,

2:12-cv-00456

GEOTAG INC.,

Plaintiff,

v.

DONNA KARAN INTERNATIONAL INC.,

Defendant,

2:12-cv-00457

GEOTAG INC.,

Plaintiff,

v.

**LVMH MOET HENNESSY LOUIS VUITTON
INC.,**

Defendant,

2:12-cv-00458

GEOTAG INC.,

Plaintiff,

v.

DOTS, LLC,

Defendant,

2:12-cv-00459

GEOTAG INC.,

Plaintiff,

v.

DRAPER'S & DAMON'S INC.,

Defendant,

2:12-cv-00460

GEOTAG INC.,

Plaintiff,

v.

EDDIE BAUER LLC,

Defendant,

2:12-cv-00461

GEOTAG INC.,

Plaintiff,

v.

ESPRIT US RETAIL LIMITED,

Defendant,

2:12-cv-00462

GEOTAG INC.,

Plaintiff,

v.

FACTORY CONNECTION LLC,

Defendant,

2:12-cv-00463

GEOTAG INC.,

Plaintiff,

v.

THE FINISH LINE INC.,

Defendant,

2:12-cv-00464

GEOTAG INC.,

Plaintiff,

v.

FOREVER 21 RETAIL INC.,

Defendant,

2:12-cv-00465

GEOTAG INC.,

Plaintiff,

v.

FORMAL SPECIALISTS LTD.,

Defendant,

2:12-cv-00466

GEOTAG INC.,

Plaintiff,

v.

**FREDERICK'S OF HOLLYWOOD STORES
INC.,**

Defendant,

2:12-cv-00467

GEOTAG INC.,

Plaintiff,

v.

GROUPE DYNAMITE, INC. D/B/A GARAGE,

Defendant,

2:12-cv-00468

GEOTAG INC.,

Plaintiff,

v.

GUESS? RETAIL INC.,

Defendant,

2:12-cv-00469

GEOTAG INC.,

Plaintiff,

v.

H&M HENNES & MAURITZ LP,

Defendant,

2:12-cv-00470

GEOTAG INC.,

Plaintiff,

v.

HANESBRANDS INC.,

Defendant,

2:12-cv-00471

GEOTAG INC.,

Plaintiff,

v.

HOT TOPIC INC.,

Defendant,

2:12-cv-00472

GEOTAG INC.,

Plaintiff,

v.

HUGO BOSS FASHION INC.,

Defendant,

2:12-cv-00473

GEOTAG INC.,

Plaintiff,

v.

J. CREW GROUP INC.,

Defendant,

2:12-cv-00474

GEOTAG INC.,

Plaintiff,

v.

JIMMY JAZZ INC.,

Defendant,

2:12-cv-00475

GEOTAG INC.,

Plaintiff,

v.

JOS. A. BANK CLOTHIERS INC.,

Defendant,

2:12-cv-00476

GEOTAG INC.,

Plaintiff,

v.

ALCO STORES INC.

Defendant,

2:12-cv-00477

GEOTAG INC.,

Plaintiff,

v.

FRED'S INC.,

Defendant,

2:12-cv-00478

GEOTAG INC.,

Plaintiff,

v.

BAKERS FOOTWEAR GROUP,

Defendant,

2:12-cv-00479

GEOTAG INC.,

Plaintiff,

v.

BROWN SHOE COMPANY INC.,

Defendant,

2:12-cv-00480

GEOTAG INC.,

Plaintiff,

v.

COLLECTIVE BRANDS INC.,

Defendant,

2:12-cv-00481

GEOTAG INC.,

Plaintiff,

v.

CROCS INC.,

Defendant,

2:12-cv-00482

GEOTAG INC.,

Plaintiff,

v.

DSW INC. D/B/A DSW SHOE INC.,

Defendant,

2:12-cv-00483

GEOTAG INC.,

Plaintiff,

v.

FLEET FEET INC.,

Defendant,

2:12-cv-00484

GEOTAG INC.,

Plaintiff,

v.

GENESCO INC.,

Defendant,

2:12-cv-00486

GEOTAG INC.,

Plaintiff,

v.

HEELY'S INC,

Defendant,

2:12-cv-00487

GEOTAG INC.,

Plaintiff,

v.

JUSTIN BOOT COMPANY,

Defendant,

2:12-cv-00488

GEOTAG INC.,

Plaintiff,

v.

AMERICAN GREETINGS CORPORATION,

Defendant,

2:12-cv-00520

GEOTAG INC.,

Plaintiff,

v.

HALLMARK CARDS, INC.,

Defendant,

2:12-cv-00521

GEOTAG INC.,

Plaintiff,

v.

HICKORY FARMS INC.,

Defendant,

2:12-cv-00522

GEOTAG INC.,

Plaintiff,

v.

SPENCER GIFTS LLC,

Defendant,

2:12-cv-00523

GEOTAG INC.,

Plaintiff,

v.

INTERNATIONAL COFFE & TEA, LLC,

Defendant,

2:12-cv-00524

GEOTAG INC.,

Plaintiff,

v.

THINGS REMEMBERED, INC.,

Defendant,

2:12-cv-00525

GEOTAG INC.,

Plaintiff,

v.

THE YANKEE CANDLE COMPANY,

Defendant,

2:12-cv-00526

GEOTAG INC.,

Plaintiff,

v.

BOSE CORPORATION,

Defendant,

2:12-cv-00527

GEOTAG INC.,

Plaintiff,

v.

GUITAR CENTER INC.,

Defendant,

2:12-cv-00528

GEOTAG INC.,

Plaintiff,

v.

PROGRESSIVE CONCEPTS INC.,

Defendant,

2:12-cv-00529

GEOTAG INC.,

Plaintiff,

v.

24 HOUR FITNESS WORLDWIDE INC.,

Defendant,

2:12-cv-00530

GEOTAG INC.,

Plaintiff,

v.

BALLY TOTAL FITNESS CORPORATION,

Defendant,

2:12-cv-00531

GEOTAG INC.,

Plaintiff,

v.

BARE ESCENTUALS INC.,

Defendant,

2:12-cv-00532

GEOTAG INC.,

Plaintiff,

v.

BIOSCRIP INC.,

Defendant,

2:12-cv-00533

GEOTAG INC.,

Plaintiff,

v.

CRABTREE & EVELYN,

Defendant,

2:12-cv-00534

GEOTAG INC.,

Plaintiff,

v.

CURVES INTERNATIONAL INC.,

Defendant,

2:12-cv-00535

GEOTAG INC.,

Plaintiff,

v.

GOLD'S GYM INTERNATIONAL INC.,

Defendant,

2:12-cv-00536

GEOTAG INC.,

Plaintiff,

v.

GREAT CLIPS INC.,

Defendant,

2:12-cv-00537

GEOTAG INC.,

Plaintiff,

v.

L.A. FITNESS INTERNATIONAL LLC,

Defendant,

2:12-cv-00538

GEOTAG INC.,

Plaintiff,

v.

LIFE TIME FITNESS INC.,

Defendant,

2:12-cv-00539

GEOTAG INC.,

Plaintiff,

v.

M.A.C. COSMETICS INC.,

Defendant,

2:12-cv-00540

GEOTAG INC.,

Plaintiff,

v.

MERLE NORMAN COSMETICS,

Defendant,

2:12-cv-00541

GEOTAG INC.,

Plaintiff,

v.

**VITAMIN COTTAGE NATURAL FOOD
MARKETS, INC.,**

Defendant,

2:12-cv-00542

GEOTAG INC.,

Plaintiff,

v.

REGIS CORPORATION,

Defendant,

2:12-cv-00543

GEOTAG INC.,

Plaintiff,

v.

SALLY BEAUTY SUPPLY LLC,

Defendant,

2:12-cv-00544

GEOTAG INC.,

Plaintiff,

v.

SEPHORA USA INC.,

Defendant,

2:12-cv-00545

GEOTAG INC.,

Plaintiff,

v.

TONI & GUY USA, LLC,

Defendant,

2:12-cv-00546

GEOTAG INC.,

Plaintiff,

v.

**ULTA SALON, COSMETICS & FRAGRANCE
INC.,**

Defendant,

2:12-cv-00547

GEOTAG INC.,

Plaintiff,

v.

VITAMIN SHOPPE INDUSTRIES, INC.,

Defendant,

2:12-cv-00548

GEOTAG INC.,

Plaintiff,

v.

EYEMART EXPRESS, LTD.,

Defendant,

2:12-cv-00549

GEOTAG INC.,

Plaintiff,

v.

**LUXOTTICA RETAIL MORTH AMERICA
INC.,**

Defendant,

2:12-cv-00550

GEOTAG INC.,

Plaintiff,

v.

NATIONAL VISION INC.,

Defendant,

2:12-cv-00551

GEOTAG INC.,

Plaintiff,

v.

U.S. VISION INC.,

Defendant,

2:12-cv-00552

GEOTAG INC.,

Plaintiff,

v.

WILD BIRDS UNLIMITED INC.,

Defendant,

2:12-cv-00553

GEOTAG INC.,

Plaintiff,

v.

JOS. A. BANK CLOTHIERS INC.,

Defendant,

2:12-cv-00554

GEOTAG INC.,

Plaintiff,

v.

BUTH-NA-BODHAIGE INC.,

Defendant,

2:12-cv-00555

GEOTAG INC.,

Plaintiff,

v.

PSP GROUP, LLC,

Defendant,

2:12-cv-00556

GEOTAG INC.,

Plaintiff,

v.

RITZ INTERACTIVE LLC,

Defendant,

2:12-cv-00557

WHERE 2 GET IT, INC.; *et al.*,

Plaintiff,

v.

GEOTAG INC.,

Defendant.

2:12-cv-00149

DECLARATION OF JOHN W. VEENSTRA

I, John W. Veenstra, hereby declare as follows:

1. I have personal knowledge of the facts set forth in this Declaration. I am competent to testify as to all matters stated, and I am not under any legal disability that would in any way preclude me from testifying.

2. I am Chief Executive Officer of GeoTag, Inc. (“GeoTag”), the Plaintiff in this case. I am also the primary named inventor of United States Patent No. 5,930,474 entitled “Internet Organizer for Accessing Geographically and Topically Based Information” (the “’474 patent”) – the patent at issue in this lawsuit.

3. GeoTag terminated its former counsel Buether Joe & Carpenter, LLC, Ni Law Firm and the Law Offices of Young Pickett on August 27, 2012. Since that time, I have been active and diligent in my efforts to secure substitute representation. GeoTag’s corporate counsel and I have personally met with five law firms and we have spoken with more than ten additional law firms regarding representation in these lawsuits. Through multiple discussions with numerous lawyers, I have discovered this litigation is too large for a single law firm to handle, therefore I am interviewing multiple law firms to assemble a team to represent GeoTag in these lawsuits. I have encountered difficulties coordinating the team effort due to a variety of factors, including the size, scope and complexity of the lawsuits, the number of defendants, conflicts of interest (many law firms have a conflict due to the number of defendants), staffing/availability necessary to take on such a complex representation and coordination with related litigation in the District of Delaware.

4. GeoTag has retained the law firm of Spangler & Fussell, P.C. as local counsel. I believe that GeoTag will need an additional fourteen (14) days to assemble its full team of lead counsel. GeoTag is not seeking this extension for delay, but so that justice may be done.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 7th day of September, 2012 in Dallas, Texas.



John W. Veenstra